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12 Attorneys for Defendant
13 CHEVRON U.S.A. INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 RYAN SCHAEFFER, et al.,
17
18 Plaintiffs,

19 vs.

20 GREGORY VILLAGE PARTNERS, L.P., et
21 al.
22 Defendants.

Case No. C11-03246 JSW

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE;
DECLARATION OF ROBERT C.
GOODMAN IN SUPPORT THEREOF**

DECLARATION OF ROBERT C. GOODMAN

23 1. I am a shareholder with the law firm of Rogers Joseph O'Donnell,
24 attorneys for Defendant Chevron U.S.A. Inc. I have personal knowledge of the facts set forth
25 herein, and if called upon could and would competently testify thereto.

26 2. Pursuant to this Court's Order dated July 21, 2011 (Document 16), a
27 case management conference ("CMC") has been scheduled for October 14, 2011 in this
28 matter.

3. Plaintiff has filed a Motion to Remand (Documents 18, 21) with a

1 hearing set for October 28, 2011 (Document 30).

2 4. Plaintiffs and Defendants have agreed that it would save resources if the
3 CMC, and related requirements under Federal Rules Civil Procedure Rule 26 and the Court's
4 ADR program triggered by the CMC date, were continued to a date after the Court has ruled
5 on Plaintiffs' motion for remand.

6 5. The date of the CMC has not been previously modified.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Executed this 22nd day of September 2011 in San Francisco, California.

9
10 /s/ Robert C. Goodman

11 Robert C. Goodman

12 IT IS HEREBY STIPULATED pursuant to Local Rule 6-1(b) and Rule 6-2(a),
13 by the parties to this action, by and through their undersigned counsel, as follows:

14 A. The CMC currently set for October 14, 2011 shall be continued to
15 December 16, 2011, or such other date as ordered by the Court.

16 B. Any and all deadlines related to the CMC shall be similarly continued.

17 Dated: September 22, 2011

PALADIN LAW GROUP LLP

18 By: /s/ Bret A. Stone

19 BRET A. STONE

20 Attorney for Plaintiff

21 Ryan Schaeffer, Anne Schaeffer, and Reese
Schaeffer

22 Dated: September 22, 2011

CASTELLON & FUNDERBURK LLP

23 By: /s/ Ruben A. Castellon

24 RUBEN A. CASTELLON

25 Attorney for Defendants

26 GREGORY VILLAGE PARTNERS, L.P.
27
28

1 Dated: September 22, 2011

ROGERS JOSEPH O'DONNELL

2 By: /s/ Robert C. Goodman
3 Robert C. Goodman

4 Attorney for Defendant
5 CHEVRON U.S.A. INC.

6 Dated: September 23, 2011

**MEYERS, NAVE, RIBACK, SILVER &
WILSON**

7 By: /s/ Kenton L. Alm
8 KENTON L. ALM

9 Attorney for Defendant
10 CENTRAL CONTRA COSTA SANITARY
11 DISTRICT

12 I attest that concurrence in the filing of this document has been obtained from Bret Stone for
13 Plaintiff, Ruben A. Castellon for Defendant Gregory Village Partners, L.P., and Kenton L.
14 Alm for Defendant Central Contra Costa Sanitary District.

15 By: /s/ Robert C. Goodman
16 ROBERT C. GOODMAN
17 Attorney for Defendant
18 CHEVRON U.S.A. INC.

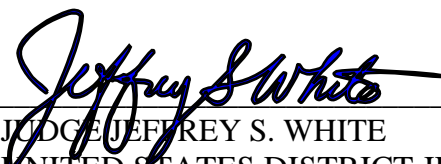
ORDER

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19 The case management conference is hereby continued to December 16, 2011, at 1:30
20 p.m. Any and all case management deadlines shall be calculated based on this new date.
21

22 **IT IS SO ORDERED.**

23
24 DATED: September 26, 2011

25 By: 
26 JUDGE JEFFREY S. WHITE
27 UNITED STATES DISTRICT JUDGE
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